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Application granted in part. First off, this request does not comply with this Court's Individual Practices, which requires an extension request to be made two days before the relevant deadline. Second, this Court has already granted one extension. And it is not this Court's practice to stay matters for settlement. As a courtesy, the Court will grant a brief additional extension to respond to the complaint to June 12, 2024. No further extensions. The initial pretrial conference currently set for June 12, 2024, is hereby adjourned to June 17, 2024, at 4:00 PM.

The Clerk of Court is directed to terminate the motion at Dkt. 10. SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Arun Subramanian'.

Arun Subramanian, U.S.D.J.

Date: May 30, 2024 May 29, 2024

VIA ECF

Hon. Arun Subramanian, U.S.D.J.
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: Ronald Jackson v. New York-Presbyterian Hospital,
Case No.: 1:24-cv-01106 (AS)**

Dear Judge Subramanian:

This Firm represents defendant New York-Presbyterian Hospital (the "Hospital") in the above-referenced action. We write, jointly with counsel for Plaintiff, to respectfully request a thirty day stay of the matter and all pending deadlines to allow the parties the opportunity to pursue an amicable resolution of the matter via mediation. Specifically, we respectfully request a stay of the Hospital's time to answer, move or otherwise respond to the Complaint, which is currently due on May 30, 2024, and that the Initial Pretrial Conference scheduled for June 12, 2024, be adjourned to a date thereafter that is convenient for the Court, with the parties' deadline to file the Civil Case Management Plan similarly extended during the duration of the stay.

The parties have selected a mediator who has extensive experience mediating matters in which plaintiffs who are deafblind assert they were deprived effective communication. The mediator has such a unique background that we believe she will be most effective in aiding the parties in resolving this matter. Accordingly, we respectfully aver that the requested stay is in the interest of judicial efficiency and moreover, it will allow the parties to avoid further litigation.

The parties have asked the mediator for her first availability and she has advised that she has two prospective dates to conduct the mediation: June 11, 2024, if the parties who previously reserved that date cancel it, and September 4, 2024, which is the mediator's next available mediation date. We will update the Court as soon as we are able to confirm the mediation date and may request a further stay of the litigation in the event that we are not able to proceed on June 11.

This is the parties first joint request for a stay. We thank the Court for its consideration of this request and its attention to this matter.

Respectfully submitted,

/s/ Shira M. Blank

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